

AFFIDAVIT OF KAREN L. LOSTRACCO IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Karen L. Lostracco, being duly sworn, depose and state:

Upon information and belief, in or about between January 1, 2016 and December 31, 2016, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant David W. Wilson, an agent of the Massachusetts State Police (“MSP”), did knowingly and intentionally embezzle, steal, obtain by fraud, misapply and otherwise without authority knowingly convert to the use of a person other than the rightful owner, property of the MSP, an agency of a local government that received benefits in excess of \$10,000 under one or more Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of Federal assistance in one or more one-year periods, which property was valued at \$5,000 or more, and was owned by, and was under the care, custody and control of the MSP, to wit: wages for overtime hours.

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

The source of your deponent's information is set forth in **ATTACHMENT A**.

The facts establishing probable cause to believe that defendant David W. Wilson violated 18 U.S.C. § 666(a)(1)(A) are set forth in **ATTACHMENT B**.

Based on the foregoing, I submit there is probable cause to believe that defendant David W. Wilson committed the crime of Theft from an Agency Receiving Federal Funds, in violation of Title 18 U.S.C. § 666(a)(1)(A).


Karen L. Lostracco
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this 26th day of June 2018, at Boston, Massachusetts.




HON. DONALD L. CABELL
United States Magistrate Judge
District of Massachusetts